

From: [Lisa Kusnierz](#)
To: [Yashan, Dean](#)
Cc: Gildea.Jason@epamail.epa.gov
Subject: Re: FW: Reasonable Assurance Language for Flint and Lower Gallatin
Date: 08/09/2012 12:07 PM
Attachments: [RsnbleAssrnce_WWTP-WLA-6-1-12_Ver7_VB edits.docx](#)

I skimmed over the RA language and it seems a little wordy but covers the bases. I forwarded to Vern and he made a few suggested edits but said he likes it and that it may be helpful to share with other states. He asked if this will be somewhat canned language for each document and I said that because you typically use the same approach, that's the idea. He was fine with that and the only real point he raised was that more RA may be necessary in cases where this approach is not used or in complicated areas (like the Flathead). I told him that you understand that.

So, here's the slightly edited version. Vern said he doesn't feel strongly about his edits and mine are fairly minor so take or leave whatever suggestions you'd like.



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▼ "Yashan, Dean" ---08/07/2012 08:29:44 AM-----Original Message----- From: Yashan, Dean

From: "Yashan, Dean" <DYashan@mt.gov>
To: Lisa Kusnierz/MO/R8/USEPA/US@EPA, Jason Gildea/MO/R8/USEPA/US
Date: 08/07/2012 08:29 AM
Subject: FW: Reasonable Assurance Language for Flint and Lower Gallatin

-----Original Message-----

From: Yashan, Dean
Sent: Thursday, August 02, 2012 9:53 AM
To: Kron, Darrin; Schmidt, Christian; Bond, Jim
Subject: RE: Reasonable Assurance Language for Flint and Lower Gallatin

Jim stopped by and based on his comments I have hopefully made it a little clearer.

-----Original Message-----

From: Yashan, Dean
Sent: Thursday, August 02, 2012 9:28 AM
To: Kron, Darrin; Schmidt, Christian
Cc: Bostrom, Mark
Subject: Reasonable Assurance Language for Flint and Lower Gallatin

Darrin and Christian,

Because EPA now says we must address RA in the Flint document, I have attached my proposed RA language for the Flint and Lower Gallatin documents. I tried to word in a way that also deals with the Fish Tech WLA in the Gallatin, not sure if that will haunt us but for now we need to at least get the Flint taken care of. Per Lisa, we can put this in the Implementation section of the document. Not sure if that is best place or not; it could also work in the main discussion section for point sources in the Gallatin. Not sure if the Flint has such a section and given where we are on the Flint document maybe Implementation section is best with a reference to that particular section provided within the Allocations section.

Darrin - if you are ok with the language, go ahead and put in the document as you prefer.

[attachment "RsnbleAssrnce_WWTP-WLA-6-1-12_Ver7.docx" deleted by Lisa Kusnierz/MO/R8/USEPA/US]